

# **EXHIBIT AG**

**WAMY'S RESPONSES TO PLAINTIFFS' EXHIBIT 54**

<b>PLAINTIFFS' ALLEGED MISSING ATTACHMENTS</b>		
<b>BATES NUMBER</b>	<b>PLAINTIFFS' DESCRIPTION</b>	<b>WAMY'S RESPONSE</b>
WAMYSA030505	August 7, 2002 letter from Saleh Bin Suliman al-Wahibi, WAMY's Deputy Secretary General for Executive Affairs, to Ibrahim Faruq al Zayyat, WAMY's representative in the Western Europe office, concerning the death of WAMY Secretary General Maneh al Johani and enclosing the minutes of an emergency meeting held by the Board of Trustees following the death of the Secretary General with the instructions received at the meeting. The meeting minutes are missing.	Letter from 5/28/1423 from Saleh bin Suleiman al Wohaibi, Assistant Secretary General of WAMY, to Ibrahim al Zayat, Western European Representative from WAMY, regarding the death of the former Secretary General of WAMY Dr. Manaa al Johani. The minutes were produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA030416	September 11, 2001 letter from WAMY Secretary General Maneh al Johani to Ibrahim Faruq al Zayyat, WAMY's representative in the Western Europe office, concerning a report discussing the Secretary General's travel to Lebanon, the Netherlands, Switzerland, and the United Kingdom between July 9, 2001 and August 13, 2001. The attached delegation report is missing.	Letter dated 6/22/1422 from Manaa bin Hamad al Johani, Secretary General of WAMY, to Ibrahim al Zayat, Western European Representative from WAMY, attaching a report from his trip to London and Switzerland and the Netherlands and Britain from 1422/5/23-17. Report was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA028202	A report cover page titled, "The estimated budget of the	Cover page: Estimated budget for LBI projects

	projects of the former LBI for 1996, whose operations are overseen by the WAMY office in Jeddah.” The report itself is not attached to the cover page.	and operations in 1417 and their oversight by WAMY. Report was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA061353	January 8, 1994 cover page of a report concerning a Lajnat al Birr al Islamiyya visit to Madagascar to conduct an inspection of the status of Muslims there. It is noted that the report was prepared by Mouhammad Sa'ed Qadi from Lajnat al Birr The report itself is missing.	LBI Report for 1414 on the visit to Madagascar and the situation of Muslims there. The full report was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA057320	April 17, 2012 letter from Ibrahim bin Hader Hošić, manager of WAMY's branch office in Bosnia-Herzegovina, to Abd al Hamid bin Yusuf al Mazru, Assistant to the Secretary General for Offices and International Relations, providing information concerning the WAMY office in Bosnia. Hošić explains that the attachment contains information regarding the work of the office, the date of its official registration, and its representatives. The attachment to the letter is missing.	Letter sent in reply to the Secretary General the requested information about a Bosnian office. The attachment to the letter (registration documents) was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA663697	The first page of WAMY's annual report – the Overseas Offices Administration and Youth Councils – a report on operating expenses and salaries for 2002. The report itself is missing.	Plaintiffs' translation is incorrect. No report is attached. This document is a letter report from 2015 from the Director of WAMY Senegal to the Secretary General, informing him that WAMY Senegal requested bank statements from Citi Bank and BICIS for 2003 and 2004. They have received their bank statements from BICIS Bank but not from Citi Bank. Citi bank is still searching for the bank accounts records, because those accounts were closed over 10 years ago (due diligence letter). <b><u>There is no mention about a report on operating expenses or salaries for 2002.</u></b>

WAMYSA001228	April 2, 2001 letter from WAMY's Assistant Secretary General to the head of the Eritrean Relief Organization, asking that the Organization carefully fill out all of the attached forms and submit them to the local WAMY office for confirmation in order for their issue to be studied by WAMY. The attached forms are missing.	A letter dated 1/8/1422 from Dr.Saleh Ibn Ibrahim Babaer to Abdelrahman Alamoudi, President of the Eritrean Refugee Relief Association, USA, informing him that their project suggestions and reports have been received and thanking him for the time and efforts placed into WAMY. Also, confirming the attachment of a form, and is requesting him to fill it out and send it as soon as he can. The form was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA001286	January 28, 2001 letter from WAMY's Assistant Secretary General to WAMY's Washington D.C. office presenting WAMY's certificate of registration in the United Nations. The attached certificate is missing.	A letter dated 11/3/1421 from Dr. Saleh Ibn Ibrahim Babaer to Dr.Samir Almuabir confirming an attachment of a photocopy of the registration of WAMY with the United Nations. The registration certificate of WAMY in the United Nations was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA001355	April 11, 1996 letter from WAMY's Secretary General to Abdullah bin Laden, WAMY's representative in the United States, presenting an attached check for the sum of \$7,200, donated by an unnamed donor to fund WAMY operations in the U.S. The attached check is missing.	A letter dated 11/22/1416 from Dr.Maneh Ibn Hamad Al Johani to Abdullah bin Laden, Director WAMY USA, confirming the attachment of a check amounting to \$7,200.00 American dollars donated by a philanthropist to cover the expenses of humanitarian projects of WAMY USA and requesting a confirmation that the check has been received as well as a report of the projects funded by this check. The check was produced to Plaintiffs. Please

		refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA001359	April 27, 1997 letter from the manager of WAMY's Resources and Relations Department to Abdullah bin Laden, presenting the Jeddah office's activity reports for 1992-1995 and offering any further needed information. The manager asks bin Laden to send annual reports for international voluntary organizations or commercial companies for the Department's planned annual report. The Jeddah office activity reports are missing.	A letter dated 12/21/1417 from Yislam Ibn Mohammed Alshiba to Abdullah bin Laden, Director WAMY USA, confirming the attachment of the WAMY Jeddah annual reports of programs, projects, and activities during the year of 1992 - 1995. The annual reports from 1992-1995 for the Jeddah office were produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA001375-1379	Undated letters from WAMY-USA to the manager of the Muslim America Society and the manager of the Institute for Islamic and Arabic Studies, presenting an attached list of books and films the office has received and a request form for Da'awa preachers who may be interested in any of the items. The list of books includes, among others, Sayyid Qutb's "In the Shadow of the Qur'an." The list of books and films is missing.	Plaintiffs' translation is incorrect. No report is attached. The document consists of two faxes. The first fax was sent in June 4, 2001 from Ibrahim Sulaiman Abdullah, Deputy Supervisor of the office of WAMY Intl, to Suhail Alfanooshi, Director of the Muslim American Society (MAS), presenting a list of books and films received by the Office for preachers who may be interested in any of them. The second fax was sent in September 18, 2002 from Ibrahim Sulaiman Abdullah, Deputy Supervisor of the office of WAMY Intl, to Ahmad Bin Seif Eddine Al Turkistani, the Director of the Institute for Islamic and Arabic Studies in America for the same purpose, presenting a list of books and films received by the Office for preachers who may be interested in any of them. <b>The list of books and films was attached with the record of the submitted faxes. Nothing is missing.</b>
WAMYSA001400	December 17, 2000 letter from WAMY-USA to WAMY's Assistant Secretary General presenting the attached certificate	A letter dated 12/17/2000 from Dr. Sami Almuaber, WAMY USA Office, to Dr.

	of WAMY's membership in the United Nations, per the Secretary General's request. The certificate is missing.	Abdelwahab Noorwali, WAMY Assistant Secretary General, confirming the sending of the requested document of registration of proof that WAMY is a member of the United Nations NGOs. The registration certificate of WAMY in the United Nations was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA001405	December 18, 2000 letter from WAMY-USA to the Assistant Secretary General for Overseas Offices presenting attached documents, including an accomplishments report for 2000, work plan for 2001, and list of expenses for 2000. The letter asks for additional funds and for approval of the next year's budget. The documents attached to the letter are missing.	A letter dated 12/18/2000 from Ibrahim Sulaiman Abdullah, Coordinator WAMY Intl, to Dr.Saleh Ibn Ibrahim Babaer, Assistant Secretary General, presenting a summarized report of their chapter achievements for the year of 2001, a report regarding their planned projects, programs, and activities for the year of 2001, as well a financial report of their programs, projects, and activities as well as all other expenses for the year of 2000. The reports were produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA001461-1462	August 7, 2001 letter from WAMY's Assistant Secretary General for Offices to the manager of WAMY-USA presenting the attached documents which are required for registration of WAMY in the United Nations' Economic and Social Council. The documents attached to the letter are missing.	A letter dated 5/17/1422 from Dr. Saleh Ibn Ibrahim Babaer, Assistant Secretary General, to Ibrahim Sulaiman Abdullah, Coordinator WAMY Intl, confirming that he has sent all requested documents needed to register WAMY with the United Nations' Social and Economic division. Requesting updates regarding the registration process. The document required for WAMY

		registration in the United Nations' Economic and Social Council was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA001263	September 5, 2001 invitation from WAMY-USA concerning a workshop the office will be holding in Washington D.C. focusing on the use of the Internet and media, and the collection of donations, together with a participant form. The invitation was sent to Dr. Ibrahim al Kulaib. The attached form is missing.	September 5, 2001 invitation from Fadel Suleiman of WAMY-USA, concerning an effective activation seminar focusing on the use of the Internet and media and fundraising event the office will be holding in Washington D.C in association with CARE organization. WAMY is performing a diligent search for the attached form and will remit if found.
WAMYSA015000	May 6, 2001 letter from Saleh bin Sulayman al Wahaibi, Assistant Secretary-General for Executive Affairs, to Ibrahim Faruq al Zayyat, WAMY's representative in the Western Europe office, concerning certain entities WAMY is interested in conducting da'awa activities with during the summer of 2001. The list of entities is missing.	Letter dated 2/12/1422 from Saleh bin Suleiman al Wahibi, Assistant Secretary General for Operational Affairs of WAMY, to Ibrahim Farouk al Zayat, WAMY Western Europe, attaching detailed information that was requested and requesting that they send information about the implementation of the activities as soon as possible. WAMY is performing a diligent search for the proposal and will remit if found.
WAMYSA015009	November 14, 2001 letter from Saleh bin Ibrahim Baba'ir, Assistant Secretary-General for Office Affairs and Foreign Relations, to Ibrahim Faruq al Zayyat, WAMY's representative in the Western Europe office, concerning a request for financial support for the Islamic Information Center in Ulm, Germany and its activities. The attached letter request from Atef Ibrahim Salah, the head of the Islamic Information Center, is missing.	A letter dated 8/29/1422 from Saleh al Babaer, Assistant Secretary General of WAMY, to Ibrahim Farouk al Zayat, WAMY Western Europe, attaching a project of the Islamic Center for Media in the City of Ulm? In Germany. It's a request for support and funding the center. WAMY is performing a diligent search for the proposal and will remit if found.
WAMYSA014997	February 16, 2002 letter from Saleh bin Ibrahim Baba'ir,	A letter dated 4/12/1422 (July 4, 2001 -

WAMYSA030399	Assistant Secretary-General for Office Affairs and Foreign Relations, to Ibrahim Faruq al Zayyat, WAMY's representative in the Western Europe office, concerning planned WAMY activities for 2001. The attached breakdown of planned activities is missing.	Plaintiffs have the wrong date) from Saleh al Babaer, Assistant Secretary General of WAMY, to Ibrahim Farouk al Zayat, WAMY Western Europe, attaching a list of scheduled activities in the region, for the summer of 1422. This breakdown of planned activities was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA014982 , 30416	September 10, 2001 letter from WAMY Secretary General Maneh al Johani to Ibrahim Faruq al Zayyat, WAMY's representative in the Western Europe office, concerning a report authored by the Secretary General regarding his travel to Lebanon, Holland, Switzerland, and the United Kingdom from July 8, 2001 to August 13, 2001. Johani asks Zayyat to distribute the report. The attached delegation report is missing.	A letter dated 6/22/1422 from Manaa bin Hamad al Johani, Secretary General of WAMY, to Ibrahim Farouk al Zayat, WAMY Representative of Western Europe, attaching parts of a report regarding his trip from Lebanon and Holland and Switzerland and Great Britain from 1422/5/23-4/17 (7/9/2001 - Plaintiffs have the wrong date). The report includes proposals and recommendations to improve level of work that WAMY is partaking in. The delegation report was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA028357	Letter from WAMY Secretary General Maneh al Johani to Adel Batterjee, head of Lajnat al Birr al Islamiyya, concerning his travel to Albania in July 2003. The delegation report is missing.	Letter dated 2/19/1413 from Manaa bin Hamad al Johani, Secretary General of WAMY, to Adel Batterjee, President of LBI, attaching a report from his trip to Albania during a specified time in 1413 and the report includes a discussion of the situation of Muslims there. WAMY is performing a diligent search for the



		report and will remit if found.
WAMYSA028319	Document references Lajnat al Birr al Islamiyya's operations and financial activities for 1995. The report is missing.	Letter dated 1/15/1416 from Hassan bin Abdel Qadr, Executive Director of LBI, to Manaa bin Hamad al Johani, Secretary General of WAMY, providing a detailed report on the activities of Lajnat al Birr al Islamiya and the most important achievements that were made during the beginning of Rajab 1415 and until the end of Dhu al hijjah 1415, with a detailed financial report on its income and expenses. The report was produced to Plaintiffs. Please refer to <u>Exhibit 4</u> in WAMY's opposition to the motion to compel - WAMY's document production indices.
WAMYSA029771	WAMY's Western Europe office (Ibrahim Zayat) is notified about the increased operational 2002 budget for the WAMY branch offices in London and Brussels. The previous year's budget and the approved increases, as mentioned in the letter, are missing.	Plaintiffs' translation is incorrect. This document is a letter dated 1/29/1417 from Manaa bin Hamad al Johani, WAMY Secretary General to the director of Dallah Al Baraka Investment Company in Jeddah, to inform him about his account number (cy 6406) in the name of Lajnat al Birr al Islamiya (WAMY). Al Johani asks the bank director to cancel all previously authorized account signatories and accounts users on the account mentioned above and replaced them with him (Dr. Manaa bin Hamad al Johani, WAMY Secretary General) and Dr. Awish Bin Harbi AL Mubarek AL Ghamedi, Assistant Secretary General of WAMY Jeddah office) and that all authority is vested in them. The decision is implemented as of the date of this letter. <b><u>There was nothing attached to the letter.</u></b>